threat to safety exists, and the scope of the sweep must be limited to alleviating that specific concern. See *Buie*, 494 U.S. at 327.

Petitioner offers no evidence that the multiple courts of appeals that have been applying *Buie* outside the context of an arrest warrant for years have had difficulty administering that well-established standard in the different settings they have confronted. While the existence of potential danger may be easier to establish in cases involving arrests, as *Buie* recognized, 494 U.S. at 333, nothing in *Buie*'s language or rationale categorically forecloses proof that an equivalent threat could arise following other lawful entries. Nor does petitioner identify any basis in the Fourth Amendment's standard of reasonableness for holding that officers' lives are less worthy of protection when enforcing a judicially issued protective order than when executing an arrest warrant.

CONCLUSION

The petition for a writ of certiorari should be denied.

Respectfully submitted.

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